

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16-cv-563-TSE-TCB

**JOINT MOTION FOR STIPULATED PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the parties, by counsel, hereby jointly move this Court to enter the attached proposed Stipulated Protective Order.

WHEREFORE, the Plaintiffs and Defendants respectfully request that the Court enter the attached Stipulated Protective Order.

Dated: August 17, 2016

Respectfully submitted,

/s/ Paul Brinkman

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

Paul Brinkman, VSB # 35950

Jeanhee Hong (*pro hac vice*)

Ariel Wade Trajtenberg (*pro hac vice*)

Diego Duran de la Vega (*pro hac vice*)

Jongwook Kim (*pro hac vice*)

William A. Margeson (*pro hac vice*)

777 Sixth Street NW, 11<sup>th</sup> Floor  
Washington, District of Columbia 20001  
Phone: (202) 538-8000  
Fax: (202) 538-8100

[paulbrinkman@quinnemanuel.com](mailto:paulbrinkman@quinnemanuel.com)

[jeanheehong@quinnemanuel.com](mailto:jeanheehong@quinnemanuel.com)

[arieltrajtenberg@quinnemanuel.com](mailto:arieltrajtenberg@quinnemanuel.com)

[diegoduran@quinnemanuel.com](mailto:diegoduran@quinnemanuel.com)

[wookiekim@quinnemanuel.com](mailto:wookiekim@quinnemanuel.com)

[billmargeson@quinnemanuel.com](mailto:billmargeson@quinnemanuel.com)

LEGAL AID JUSTICE CENTER  
Simon Sandoval-Moshenberg, VSB #77110

6066 Leesburg Pike, Suite 520

Falls Church, VA 22041

Phone: (703) 778-3450

Fax: (703) 778-3454

[simon@justice4all.org](mailto:simon@justice4all.org)

*Counsel for Plaintiffs*

/s/ Michael S. Dingman

REED SMITH LLP

Michael S. Dingman, VSB # 30031

Justin deBettencourt, VSB # 83806

7900 Tysons One Place, Suite 500

McLean, Virginia 22101

Phone: (703) 641-4200

Fax: (703) 641-4340

[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)

[jdbettencourt@reedsmith.com](mailto:jdbettencourt@reedsmith.com)

*Counsel for Defendants*